

**Torres, Francine**

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**From:** neil@blackpearlsinc.com%inter2 [neil@blackpearlsinc.com] on behalf of neil@blackpearlsinc.com  
**Sent:** Tuesday, February 22, 2005 3:06 PM  
**To:** Torres, Francine  
**Subject:** NOSB seafood standards  
**Attachments:** ATTACHMENT.TXT

Dear Francine,

Dr Dale Sarver, my co-founder in Kona Blue Water Farms, LLC, sent the comments below to you on February 11<sup>th</sup>, so that they might be accepted for submission at the upcoming USDA/NOSB hearings on organic seafood guidelines. Unfortunately, we had only received notice of these hearings on that day, and Dale responded quickly to ensure that we would have these issues raised at the hearings.

Dale's email did not formally request that these comments be submitted to the NOSB. We would like to request this, and to ask if it is possible for these written comments to be read to the Board (by a Board clerk, or such?). If not, would it be possible for us to have a representative of ours to attend the hearings and either read these comments, or make additional comments?

As Dale indicated, Kona Blue is literally charting new waters in developing open ocean fish farming for high-value marine fish species. Our farm is located in pristine Class AA waters, in depths over 200 ft off the Kona Coast, in Hawaii. We embrace and emphasize the sustainability and natural processes in our farming operation. We are also very keen to assist in the drafting of organic standards for seafood, and to market our superb Kona Kampachi <sup>TM</sup> product under such certification.

The Chairman of the Board for Kona Blue, Mr Tom McCloskey, has considerable experience in this area. Mr McCloskey was the Chairman of Horizon Organic Dairy Products during the formative years of that company's ascendancy, to where it is now the world's largest producer of organic dairy products. Mr McCloskey, and all of Kona Blue, stand ready to assist you in any way in the process of moving forward with organic seafood standards under the USDA imprimatur.

To this end, we would like to put ourselves forward as willing to assist as industry representatives for the aquatic animal task force. Is the Board actively seeking candidates for the task force at this stage? If so, is there a procedure for nomination or application?

Thanks in anticipation of your answers. We look forward to working with you in these endeavors.

Sincerely, with aloha,

Neil Anthony Sims  
President, CEO

**Kona Blue**

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2/22/2005

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At 09:04 AM 2/11/2005 -1000, dale sarver wrote:

Francine Torres  
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Hello Francine,

We are pleased that USDA is developing standards for organic fish. As you are no doubt aware, there is a large and growing interest in this subject, both from consumers and many producers. We fully understand the complexities of this issue and want to contribute by providing comment from the producers point of view. We are developing the largest open ocean fish farm in the country, and only the second in the nation. We are striving to produce the healthiest product possible, and it would be of great help to us and consumers to have some sort of accepted standards for farm reared fish.

While it may seem that ocean-based food production is very different from its land-based counterparts, there similarities we should consider.

#### AIR / WATER EQUIVALENTS

Terrestrial farm animals breath air, and marine farmed animals breath water. Both are highly variable in quality, pollution levels, and physical characteristics and move all around the globe. Organic standards for land-based farms are not based on air quality, and marine farms should not be either. There is no possible way to know how the water characteristics will change day-to-day, or year-to-year. Pollutants falling out of the air on the grass on an organic farm is not part of the standards, and the occasional peaks in concentrations of what may or may not be considered "chemicals" should not be included in aquatic farming standards either. If a farmer sets up in a known polluted area, they do so at their peril, as aquatic animals do not thrive in such areas anyway. Water quality standards should not be considered in classifying organic standards.

#### FORAGE GRASS / FORAGE BAITFISH

Just as a farmer only has limited control over the grass that grows in his fields, fish farmers have little control over the plankton and baitfish that are harvested for ingredients to make fish food. The argument that you cannot use fisheries products for fish feed just because "you don't know where have been" does not make any sense. If there is sufficient concern about "pollutants" in the fish feed, it seems the only reasonable answer would be for feed to be tested for these chemicals, and develop standards.

## ORGANIC STANDARDS / BEST PRACTICES STANDARDS

There has been a lot of confusion regarding these subjects. One does not necessarily have anything to do with the other. The conditions and environmental criteria necessary for fish health is extremely variable depending on fish species, climate, depth of water, amount of current, and any number of other variables. A lot of people are fixated on salmon farming and think all rules should be based on the methods used for this fish.

There has been an effort for animal welfare groups and the like to insinuate their agenda into organic standards. How many fish you have in a cage, or how often you feed them, or how you harvest should not be part of the organic standards. If these subjects are to be regulated, it should be in the Best Practices arena.

## METHODS OF CULTURE

### Broodstock

There is a concern by some people over all use of "chemicals" in all the stages of production including broodstock. Regardless of what might be done as far as treating the broodstock to clean them up of parasites, infections etc., there is no way anything is going to be transferred to the baby production fish.

### Egg Treatment

Egg washing is also another subject that has come up. It is standard practice to clean up fish eggs with iodine, ozone, or formalin. Otherwise larval culture suffers from infections coming from dirty eggs. In our species for instance, larval culture would be impossible without this step. These chemicals are only used for an hour or so and do not penetrate inside the eggs. It is washed completely off the eggs, and again does not get carried on to the baby fish.

### Fish Treatment

Occasionally fish get injured or sick. Proper management techniques can drastically reduce the incidence of these problems, but occasionally these problems crop up. There are only a very few approved treatment options available, but they can be essential to the survival of the fish when certain problems crop up.

We can certainly understand the sensitivity about this subject as the treatments are being done on the fish that are going to be eaten. This is especially relevant when these treatments become routine or prophylactic and treatment chemicals remain in the fish. However, there are approved treatments with chlorine, oxygen peroxide, ozone, altered salinity, iodine, or the like that leave no residual traces in the fish. These treatments should be allowed in organic specifications.

Occasionally antibiotic treatment is necessary in a particular batch of fish. USDA recognizes this and allows land-based farms to use antibiotics in emergencies, and it does not affect their organic status. I am sure there needs to be limits in these applications, but there should be some allowance approved treatments for emergencies.

## PRODUCT TESTING

A lot of these problems could be solved by rational testing procedures and declarations similar to product statements on most other food products. Maybe some acceptable limits on the levels of chemicals in question could be developed. Maybe it would not have to be under an "Organic" standard, but some other "Clean" standard. This way people would know exactly what is in the fish.

I would be happy to talk to discuss any of these subject with you further.

Aloha,

Dale Sarver

Dale Sarver, Ph.D.

President

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